



## JOY HOFMEISTER

STATE SUPERINTENDENT OF PUBLIC INSTRUCTION  
OKLAHOMA STATE DEPARTMENT OF EDUCATION

January 21, 2015

Mr. Scott Fern  
Office of Legal Counsel  
Regents for Oklahoma State University and the  
Oklahoma Agricultural & Mechanical Colleges  
5th Floor - Student Union  
Stillwater, OK 74078

Dear Mr. Fern:

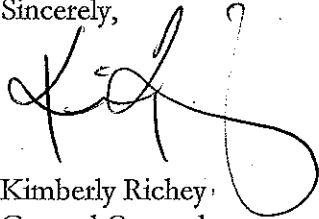
This letter is to notify you of the ongoing inquiry of the Oklahoma State Board of Education into the operations, accounting, and oversight of the Alexis Rainbow Arts Academy Charter School ("Charter School"). For the last several months, Oklahoma State Department of Education ("SDE") staff have been working to address compliance concerns with the operation of the Charter School. Offices within the Department have been working independently to attempt to bring the Charter School into compliance. Based at least in part on the Charter School's failure to respond to SDE compliance efforts, on December 23, 2014, the Oklahoma State Board of Education ("OSBE") voted to withhold state funds allocated to the Charter School until a report is submitted by the school that includes information identified by the SDE. Because Langston University is the sponsor of the Charter of Alexis Rainbow, the SDE will be including representatives of the Regents for Oklahoma State University and the Oklahoma Agricultural & Mechanical Colleges in all correspondence, primarily through your office. As you know, the SDE attempted to contact representatives of Langston University prior to the SBE meeting on December 23, 2014. The SDE was unable to establish a line of communication and the SDE has not been contacted by Langston University since the Board's action on December 23rd. Any support your office can provide in coordinating communications with representatives of Langston University is much appreciated.

Over the last four weeks, staff have worked to identify all areas of non-compliance related to the operation of the Charter School. The attachment to this letter represents an updated, current list of items needed from the Charter School in order to achieve initial compliance. Preliminary indications have revealed delinquencies in reporting, inaccurate data/information included in submitted reports, and missing information/records by the charter school. Secondary compliance efforts have revealed more significant areas of concern. Over the next several weeks, as the Charter School attempts to collect and submit the information included in the attachment to this letter, SDE staff will be conducting interviews of charter school staff, vendors, and other interested parties to collect additional information requested by the OSBE. The gathering of this additional information, through interviews, will allow the SDE to finalize the audit and ensure there are no remaining areas

of noncompliance. At the conclusion of the interviews, a report will be provided that identifies a final list of documentation/information needed for submission to the OSBE. Last, upon approval of the OSBE, the SDE will provide a clear analysis of all compliance issues and outline a plan for improvement.

As of the date of this letter, the following list represents the necessary information needed from the Charter School. If you have any questions or concerns, please don't hesitate to contact me at [Kimberly.richey@sde.ok.gov](mailto:Kimberly.richey@sde.ok.gov) or 405-521-4352.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kimberly Richey', with a large, stylized flourish at the end.

Kimberly Richey  
General Counsel  
State Board of Education

CC: Dr. Kent J. Smith, Jr., President, Langston University

**List of Information Needed for Submission  
To the State Board of Education ("OSBE")**

1. Information related to staff member and teacher employment:
  - a. Copies of all teacher contracts and part time support or teacher/instructor contracts.
  - b. Copies of Policies and Procedures distributed to staff
  - c. Copies of Payroll invoices for the last twelve months
2. Documentation of the charter school's participation in Foster Grandparent Program for any teacher assistants working under this program.
3. Background Checks
  - a. Background checks on all certified teachers. (The Department has not received documentation on teachers Washington and Kennedy).
  - b. Background checks on staff. (The Department has not received documentation on teacher assistant Wallace (Foster Grandparent Program pays her/no contract/not included on Personnel Report)).
4. Completed Gifted Plan
  - a. Updated information, as outlined by OSDE Employee Ms. Timmie Spangler on 1/6/15.
  - b. Address remaining deficiencies in the plan submitted to Ms. Spangler on 1/6/15.
  - c. Documentation of Students Turned in for Gifted Count and Services Provided.
5. Special Education
  - a. The charter school must implement a Child Find program, as required by IDEA.
6. Financial Records/Financial Compliance
  - a. Activity Account Documentation
  - b. Description of all Financial Withdrawals
  - c. Plan for Paying Money to Vendors from Last Year's Operational Expenses
  - d. Identify the charter school's School Treasurer, Encumbrance Clerk, and school auditor and identify whether such individuals have completed mandated training, if applicable.
  - e. Submit copies of all bond information. (Copies of the bonding documentation, as required by law)
  - f. Submit copies of policies and procedures relating to the charter school's processes relating to financial oversight/compliance.
7. School Handbook and policies relating to student dismissals on the basis of behavioral problems. (Information indicates the Charter School dismisses students identified as having behavioral problems and students whose parents/guardians have been identified as "problematic.")

8. Governing Board Member Information

- a. Copies of posted, regularly scheduled meetings that have occurred over the last six months.
- b. Copies of posted, regularly scheduled meeting agendas that have occurred over the last six month.
- c. Copies of Board-approved public meeting minutes for meetings that have occurred over the last six months.

9. Parental Payments

- a. Copies of all correspondence that has been distributed to parents requiring financial payment for students enrolled in the school.
- b. A specific accounting of the monies received from parents/guardians of students attending the school.
- c. Information relating to the procedure the charter school follows in collecting monies submitted by parents/guardians of students who attend the school.
- d. Documentation of how the money collected from parents/guardians was expended, including copies of receipts.